HEXCEL



May 24, 1990

Mr. Steve Maybury
New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
401 E. State Street, Fifth Floor
CN028
Trenton, NJ 08625

RE: ERCA Case No. 86009, Former Hexcel Corporation Facility
Lodi, New Jersey

Dear Mr. Maybury:

On March 20, 1990, we forwarded a letter to you that described a series of actions that Hexcel Corporation had initiated during the interim period while we were awaiting your written approval of our proposed Remediation Plan. In addition, we requested a meeting with you prior to receipt of final written approval of the Remediation Plan in order to discuss some of our scheduling concerns. This letter is written to reiterate our interest in scheduling a meeting at your earliest possible convenience, to provide you with an update of recent progress concerning implementation of the proposed Remediation Plan, and to advise you of our intention to initiate site remediation activities in the near future.

As indicated in our March 20, 1990 letter, Hexcel Corporation issued a Request for Proposal (RFP) to five potential remedial contractors for the purpose of obtaining bids for providing certain remediation services at the Lodi facility. The scope of services includes the design, construction, and start-up of the following systems: 1) a DNAPL recovery system, 2) an oil recovery system, 3) an oil/water separator system, 4) a ground water collection system for the upper aquifer, and 5) a ground water treatment system. The scope of services also includes building decontamination activities within the boiler room and upper areas of the pit located in Building I.

On March 14, 1990, a pre-bid meeting was held at the facility and proposals were received from four remedial contractors on April 2, 1990. Based on our review and evaluation of the proposals, Hexcel Corporation has decided to award a contract to Heritage Remediation/Engineering, Inc. ("Heritage") of Indianapolis, Indiana to complete the scope of services contained in the RFP. Contract negotiations are nearing completion and it is anticipated that a

Mr. Steve Maybury May 24, 1990 Page 2

contract will be executed between Hexcel Corporation and Heritage in the near future.

Although Hexcel would prefer to receive your written approval of the proposed Remediation Plan prior to commencing work, we are prepared to initiate the activities contained within the RFP on an "at risk" basis, if necessary, in order to demonstrate our good faith and to ensure continued progress toward remediation of the Based on the implementation schedule provided by Heritage, we expect that design and permitting activities will be completed within 34 days following contract award. To this end, Hexcel has already received approval from the Passaic Valley Sewerage Commission for the discharge of treated ground water to the industrial sewer system, and has developed applications for a Significant Industrial User (SIU) permit, a Discharge Groundwater permit, and an Air Clean-up Apparatus permit. permit applications have been submitted to the NJDEP, and we request your assistance in expediting the permit approval process. Construction start and completion dates are tentatively scheduled to occur within 55 days and 107 days, respectively, following contract award. Assuming that the contract is awarded on May 29, 1990, as planned, construction would start on July 23, 1990 and be completed by September 13, 1990. It should be recognized at the outset that this schedule is contingent upon numerous factors, many of which are beyond our direct control.

In your draft approval letter of the Remediation Plan, which was issued in November 1989, it is stated that "Hexcel Corp. shall notify the NJDEP in writing and by phone at least <u>fourteen days</u> prior to the implementation of all sampling and fieldwork." Accordingly, please be advised that it is our intention to initiate construction activities on July 23, 1990. We will also contact you in early July to confirm this construction start date with you. As indicated above and in our previous correspondence, we are very interested in meeting with you prior to receipt of final approval of the Remediation Plan. Please contact me as soon as possible to make arrangements for this meeting, and do not hesitate to call if you have any questions concerning the information provided in this letter.

Sincerely yours,

A. William Nosil

Corporate Environmental Engineering Manager

AWN\lr

cc: Gary Straub-Fine Organics
John Schroeter-Environ Corp.